



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

RAS
F. #2021R00525

*271 Cadman Plaza East
Brooklyn, New York 11201*

July 13, 2021

By E-Mail and ECF

Ashley Burrell, Esq.
The Federal Defenders of New York
One Pierrepont Plaza, 16th Floor
Brooklyn, NY 11201
Email: ashley_burrell@fd.org

Re: United States v. Ali Alaheri
Criminal Docket No. 21-296 (RPK)

Dear Ms. Burrell:

Enclosed please find the government's supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. The government renews its request for reciprocal discovery from the defendant.

Specifically, enclosed please find:

- Redacted New York City Police Department ("NYPD") reports in connection with an assault and robbery that took place on May 19, 2021, at approximately 9:02 a.m. in the vicinity of 1106 36th Street in Brooklyn, New York (the "Assault"), Bates-numbered AA000116-AA000120;
- A redacted NYPD mugshot viewing report in connection with the Assault, Bates-numbered AA000121-AA000140;
- Redacted NYPD event chronologies, Bates-numbered AA000141-AA000159;
- A redacted NYPD complaint report in connection with the May 19, 2021 arson charged in the above-captioned indictment (the "Arson"), Bates-numbered AA000160-AA000162;

- Redacted NYPD reports in connection with the Arson and Assault, Bates-numbered AA000163-AA000182;
- Redacted NYPD property clerk invoices, Bates-numbered AA000183-AA000189;
- A Miranda warnings form initialed by the defendant, Bates-numbered AA000190;
- Photographs of items seized from the defendant at the time of his arrest on May 21, 2021, Bates-numbered AA000191-AA000199;
- A redacted NYPD evidence collection team (“ECT”) report and attached photographs, Bates-numbered AA000200-AA000217;
- A redacted NYPD report, Bates-numbered AA000218-AA000219;
- A redacted NYPD complaint report regarding a May 19, 2021 bicycle theft (the “Bicycle Theft”), Bates-numbered AA000220-AA000222;
- A redacted NYPD report in connection with the Bicycle Theft, Bates-numbered AA000223-AA000224; and
- Redacted reports prepared by the New York City Office of Chief Medical Examiner regarding DNA analysis, Bates-numbered AA000225-AA000234.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

JACQUELYN M. KASULIS
Acting United States Attorney

By: /s/ Rachel A. Shanies
Rachel A. Shanies
Assistant U.S. Attorney
(718) 254-6140

Enclosures

cc: Clerk of the Court (RPK) (by ECF) (without enclosures)